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8 *Lead Counsel for Plaintiffs and the Class*

9 *[Additional Counsel on Signature Page]*

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

12 YAN WANG, individually and on
13 behalf of all others similarly situated,

14 Plaintiff,

15 v.

16 DADA NEXUS LIMITED, JEFF
17 HUIJIAN HE, BECK ZHAOMING
18 CHEN, LAURA MARIE BUTLER,
19 BAOHONG SUN, JIAN HAN, AND
20 JD.COM, INC.

21 Defendants.
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Case No. 2:24-cv-00239-SVW-BFM

**NOTICE OF UNOPPOSED
MOTION AND UNOPPOSED
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

CLASS ACTION

Date: November 25, 2024

Time: 1:30 p.m.

Courtroom: 10A

Judge: Hon. Stephen V. Wilson

1 Lead Plaintiff Senthil Subramanian and named plaintiff Yan Wang
2 (“Plaintiffs”), individually and on behalf of the proposed settlement class, respectfully
3 submit this Unopposed Motion for Preliminary Approval of Class Action Settlement.

4 PLEASE TAKE NOTICE that on November 25, 2024, or such date as
5 determined by the Court, in the United States District Court for the Central District of
6 California, Plaintiffs will and hereby do move the Court for an order: (i) certifying the
7 Settlement Class for settlement purposes only, appointing Plaintiffs as class
8 representatives, and appointing The Rosen Law Firm, P.A. as class counsel; (ii)
9 preliminarily approving the proposed Settlement of this class action; (iii) approving the
10 parties’ proposed form and method of notifying the Settlement Class of the action and
11 the proposed Settlement and directing that such notice be disseminated to the
12 Settlement Class; (iv) setting deadlines for Settlement Class members to exercise their
13 rights in connection with the proposed Settlement; and (v) setting a hearing on whether
14 the Court should grant final approval of the Settlement, dismiss claims against
15 Defendants, approve the release of claims against all released parties, enter judgment,
16 and award attorneys’ fees and expenses to Lead Counsel and award to Plaintiffs. This
17 motion is based upon the Memorandum of Points and Authorities in Support of
18 Plaintiffs’ Motion for Preliminary Approval, all records and papers on file in this
19 action, and any argument offered at a hearing on this motion.

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21 Plaintiffs make this motion following the conference of counsel pursuant to
22 Local Rule 7-3, conducted on October 14, 2024, during which Defendants’ counsel
23 advised that Defendants do not oppose this motion.
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1 Dated: October 14, 2024

THE ROSEN LAW FIRM, P.A.

2 /s/ Phillip Kim

3 Phillip Kim (*pro hac vice*)

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20 *Lead Counsel for Plaintiffs and the*
21 *Class*

CERTIFICATE OF SERVICE

I, Phillip Kim, hereby declare under penalty of perjury as follows:

I am the managing attorney of The Rosen Law Firm, P.A., with offices at 355 South Grand Avenue, Suite 2450, Los Angeles, CA 90071. I am over the age of eighteen.

On October 14, 2024, I electronically filed the foregoing NOTICE OF UNOPPOSED MOTION AND UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT with the Clerk of the Court using the CM/ECF system which sent notification of such filing to counsel of record.

Executed on October 14, 2024.

/s/Phillip Kim